1   QUINN EMANUEL URQUHART & SULLIVAN, LLP
      Charles K. Verhoeven (Bar No. 170151)
2   charlesverhoeven@quinnemanuel.com
      David A. Perlson (Bar No. 209502)
3   davidperlson@quinnemanuel.com
      Melissa Baily (Bar No. 237649)
4   melissabaily@quinnemanuel.com
      John Neukom (Bar No. 275887)
5   johnneukom@quinnemanuel.com
      Lindsay Cooper (Bar No. 254886)
6   jordanjaffe@quinnemanuel.com
    50 California Street, 22nd Floor
7   San Francisco, California 94111-4788
    Telephone: (415) 875-6600
8   Facsimile: (415) 875-6700

9   Attorneys for WAYMO LLC

10   UNITED STATES DISTRICT COURT

11   NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12   WAYMO LLC,   CASE NO. 3:17-cv-00939-WHA

13   Plaintiff,   **DECLARATION OF LINDSAY COOPER
                                            IN SUPPORT OF PLAINTIFF WAYMO
14   vs.   LLC'S ADMINISTRATIVE MOTION TO
                                            FILE UNDER SEAL ITS MOTION FOR
15   UBER TECHNOLOGIES, INC.;   JURY INSTRUCTION BASED ON
     OTTOMOTTO LLC; OTTO TRUCKING   SPOLIATION**
16   LLC,

17   Defendants.

18

19

20

21

22

23

24

25

26

27

28

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal ("Waymo's Administrative Motion") confidential information in its Motion for Jury Instruction Based on Spoliation ("Waymo's Motion"). Waymo's Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Motion	Highlighted in blue	Defendants
Exhibit 1 to Waymo's Motion	Entire document	Defendants
Exhibit 2 to Waymo's Motion	Entire document	Defendants
Exhibit 3 to Waymo's Motion	Entire document	Defendants
Exhibit 4 to Waymo's Motion	Entire document	Defendants
Exhibit 5 to Waymo's Motion	Entire document	Defendants
Exhibit 6 to Waymo's Motion	Entire document	Defendants
Exhibit 7 to Waymo's Motion	Entire document	Defendants
Exhibit 10 to Waymo's Motion	Entire document	Defendants
Exhibit 12 to Waymo's Motion	Entire document	Defendants
Exhibit 13 to Waymo's Motion	Highlighted in blue	Defendants
Exhibit 14 to Waymo's Motion	Entire document	Defendants and or third-parties
Exhibit 15 to Waymo's Motion	Entire document	Defendants
Exhibit 16 to Waymo's Motion	Entire document	Defendants
Exhibit 18 to Waymo's Motion	Entire document	Defendants
Exhibit 19 to Waymo's Motion	Entire document	Defendants
Exhibit 22 to Waymo's Motion	Entire document	Defendants
Exhibit 23 to Waymo's Motion	Entire document	Defendants and or third-parties
Exhibit 24 to Waymo's Motion	Entire document	Defendants and or third-parties
Exhibit 25 to Waymo's Motion	Entire document	Defendants and or third-parties
Exhibit 26 to Waymo's Motion	Entire document	Defendants
Exhibit 27 to Waymo's Motion	Entire document	Defendants and or third-parties
Exhibit 28 to Waymo's Motion	Entire document	Defendants
Exhibit 29 to Waymo's Motion	Entire document	Defendants

1   3.   Waymo's Motion and exhibits contain information that Defendants and/or third-parties

2 have designated as confidential and/or highly confidential.

3   4.   Waymo takes no position on the merits of sealing the designated material, and expects

4 Defendants and/or other third parties to file one or more declarations in accordance with the Local

5 Rules.

6   I declare under penalty of perjury under the laws of the State of California that the foregoing is

7 true and correct, and that this declaration was executed in San Francisco, California, on November 13,

8 2017.

9   By */s/ Lindsay Cooper*
        Lindsay Cooper
10   Attorneys for WAYMO LLC

11

12   **SIGNATURE ATTESTATION**

13   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the

14 filing of this document has been obtained from Lindsay Cooper.

15

16   */s/ Charles K. Verhoeven*
        Charles K. Verhoeven

17

18

19

20

21

22

23

24

25

26

27

28